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Attorneys for Defendants  
CITY OF LOS ANGELES  
(also erroneously sued as the Office of Wage Standards for the City of Los Angeles) and ERIC GARCETTI, in his official capacity as Mayor of Los Angeles

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

BARLOW RESPIRATORY HOSPITAL,  
at al.;

### **Plaintiffs.**

V.

CITY OF LOS ANGELES; OFFICE OF  
WAGE STANDARDS FOR THE CITY  
OF LOS ANGELES; ERIC GARCETTI,  
in his official capacity as Mayor of Los  
Angeles; and DOES 1-20,

### Defendants.

Case No. 2:22-CV-04828-JLS-GJS

**SECOND STIPULATION TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

**Complaint served: July 15, 2022**  
**Current response date: Sept. 6, 2022**  
**P.I. hearing date: Sept. 16, 2022**  
**Proposed new response date: Oct. 6, 2022**

1        WHEREAS, Defendants City of Los Angeles (also erroneously sued and served as  
2 the Office of Wage Standards for the City of Los Angeles) and Eric Garcetti  
3 (“Defendants”) were served with a copy of Plaintiffs’ summons and Complaint on July  
4 15, 2022;

5        WHEREAS, Plaintiffs’ Motion for Preliminary Injunction was initially set for  
6 hearing on August 5, 2022, the same date Defendants’ response to the Complaint was  
7 due;

8        WHEREAS, pursuant to Local Rule 8-3, the parties stipulated to extend the time  
9 for Defendants to respond to the Complaint for 30 days until September 6, 2022, due to  
10 the 30th day falling on Sunday, September 4, 2022, and the 31st day falling on Labor  
11 Day, September 5, 2022;

12       WHEREAS, a referendary petition was submitted to the Los Angeles City Clerk  
13 on August 10, 2022, and if the Clerk certifies the petition, Los Angeles Ordinance No.  
14 187566, the constitutionality of which is the subject of this litigation, would not take  
15 effect unless adopted by voters at a future election;

16       WHEREAS, in light of the Los Angeles City Clerk’s receipt of the referendary  
17 petition, the hearing on Plaintiffs’ Motion for Preliminary Injunction was continued to  
18 September 16, 2022 (Dkt. 33);

19       WHEREAS, the result of the Los Angeles City Clerk’s review of the referendary  
20 petition and the outcome of the hearing on Plaintiffs’ Motion for Preliminary Injunction  
21 may impact the nature of Defendants’ response to the Complaint, or even the need for  
22 one at all; therefore, continuing the deadline for Defendants’ response to the Complaint  
23 would further the interests of judicial economy and avoiding the unnecessary  
24 expenditure of the Court’s and the Parties’ resources.

25       NOW THEREFORE, the Parties, through their respective counsel of record,  
26 stipulate that good cause supports continuing Defendants’ deadline to respond to  
27  
28

1 Plaintiffs' Complaint and respectfully request the Court continue Defendants' deadline  
2 to the respond to Plaintiffs' Complaint from September 6, 2022 to October 6, 2022.  
3

4 It is so stipulated.

5 DATED: August 17, 2022

Respectfully submitted,

6 MICHAEL N. FEUER, City Attorney  
7 SCOTT MARCUS, Chief Assistant City Attorney  
8 GABRIEL S. DERMER, Assistant City Attorney  
9 **ARLENE N. HOANG, Deputy City Attorney**  
**JOSEPH S. PERSOFF, Deputy City Attorney**

10 By: /s/ Joseph S. Persoff

11 Joseph S. Persoff, Deputy City Attorney  
12 Attorneys for Defendants

13 DATED: August 17, 2022

GIBSON, DUNN & CRUTCHER LLP

14 By: /s/ Maurice Suh

15 Maurice Suh  
16 Jeremy S. Smith  
17 Andrew M. Kasabian  
18 Patrick J. Fuster  
19 Attorneys for Plaintiff California Hospital Association

20 DATED: August 17, 2022

BELL, MCANDREWS & HILTACHK, LLP

21 By: /s/ Thomas W. Hiltachk

22 Thomas W. Hiltachk  
23 Brian T. Hildreth  
24 Paul T. Gough  
25 Attorneys for Plaintiffs Barlow Respiratory Hospital;  
26 PIH Health Good Samaritan Hospital; Providence Holy  
27 Cross Medical Center; Hospital Association of Southern  
28 California

1                   **ECF ATTESTATION**

2                   I, Joseph S. Persoff, attest pursuant to C.D. Local Rule 5-4.3.4(a)(2) that the  
3 concurrence in the filing of this document has been obtained by the above signatories.

4  
5                   DATED: August 17, 2022

6                   \_\_\_\_\_  
7                   /s/ Joseph S. Persoff  
8                   Joseph S. Persoff  
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